

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
International Bureau Seeks Comment on)	IB Docket No. 16-185
Recommendations Approved by World)	
Radiocommunication Conference Advisory)	
Committee)	
)	

COMMENTS OF ERICSSON

Ericsson submits these comments in response to the International Bureau’s Public Notice (“*Notice*”) in the above-captioned proceeding seeking comment on the draft recommendations provided by the WRC-19 Advisory Committee (“WAC”) and the differing views expressed by the WAC in documents WAC/053, WAC/055 and WAC/058.¹

Ericsson appreciates the work performed by the WAC and its informal working groups to approve and provide for the Commission’s consideration draft recommendations on a number of issues that will be considered by the 2019 World Radiocommunication Conference (WRC-19). Ericsson provides the following comments to discuss the differing views in documents WAC/053, WAC/055 and WAC/058 to assist the FCC in its upcoming consultations with the U.S. Department of State and NTIA in the development of U.S. positions for WRC-19.

¹ 5th WRC-19 Advisory Committee, Public Notice, IB 16-185 (rel. April 26, 2018) (“*Notice*”).

I. Document WAC/053 (23.04.18). WRC-19 Agenda Item 1.13: Ericsson supports View A.

Global tuning ranges will play a significant role in establishing harmonized global spectrum for 5G because each administration will be able to accommodate its national priorities while simultaneously benefiting from the economies of scale that flexible tuning ranges will enable for 5G equipment. In Ericsson's view the 37.0-43.5 GHz spectrum is a significant priority band for the industry because many administrations are considering it for IMT use and so, it could succeed at WRC-19.

In addition, we are opposed to any Views that would specify the minimum downtilt and maximum EIRP of base stations. Any such mandates would limit deployment flexibility and the design of IMT systems, and limit the potential range of viable use cases, possibly contrary to market demands.

II. Document WAC/055 (23.04.18). WRC-19 Agenda Item 9.1, Issue 9.1.1: Ericsson supports View A.

Ericsson supports No Change (NOC) as described in View A. IWG-2 members were not able to reach consensus on a proposal for WRC-19 Agenda Item 9.1, Issue 9.1.1 regarding the possible technical and operational measures to ensure coexistence and compatibility between the terrestrial component of IMT and the satellite component of IMT in the frequency bands 1980–2010 MHz and 2170–2200 MHz. Ericsson is concerned that the proposals to introduce co-existence measures and constraints could impact existing deployments in the PCS and AWS bands in the United States.

We also are concerned about the impact beyond the United States. The proposed constraints on terrestrial operations, including changes to the duplex direction and limiting the

terminal transmitter output power delivered to the antenna of terrestrial IMT stations, would limit the ability of other administrations to benefit from ecosystem development in the United States.

III. Document WAC/058 (23.04.18). WRC-19 Agenda Item 8. Ericsson supports View B.

Ericsson is opposed to removing the United States from the footnotes under agenda item 8. In our view, the United States' national decision is very clear on which frequencies are being used by which service. Therefore, the removal of the footnotes is not necessary for regulatory clarity. By contrast, removing the United States from these footnotes would have a negative impact by reducing future flexibility for the United States—without providing any additional protection to the broadcasters.

In addition, the FCC is a world leader in terms of spectrum policy, to whom other administration refer for guidance. Removing the United States from these footnotes would send the wrong message to other administrations. Therefore, it is important to retain flexibility on the international stage in the Radio Regulations. Ericsson supports No Change (NOC) for the proposal on Agenda Item 8.

Respectfully submitted,

ERICSSON

By: /s/ Mark Racek

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